IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. GRACE & CO., et al., Debtors.)	Case No. 01-1139 (JKF)
)	Jointly Administered
)	•
)	Re: Docket Nos. 9300, 9302
)	9315, and 12405

CERTIFICATION OF COUNSEL TO THE OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE CLAIMANTS REGARDING PROPOSED ORDER MODIFYING VARIOUS DEADLINES REGARDING OBJECTIONS TO ASBESTOS PROPERTY DAMAGE CLAIMS

- 1. On July 24, 2006, the stay of the proceedings was lifted and the Court, among other things, directed the Debtors to meet and confer with the Official Committee of Asbestos Property Damage Claimants (the "PD Committee") and counsel to holders of asbestos property damage claims ("PD Claims") to prepare a new Case Management Order and Notice with respect to the 15th Omnibus Objection (Substantive) to Asbestos Property Damage Claims (the 15th Omnibus Objection) (Docket No. 9315) which addresses the claims objection process and PD estimation process going forward.
- 2. The Debtors and the PD Committee met and conferred, but were unable to reach agreement on a Case Management Order and Notice due to a number of reasons, including the Debtors' failure to provide notice of their proposed Case Management Order and Notice to all counsel to holders of PD Claims.
- 3. On August 17, 2006, the Debtors filed their Certification of Counsel with respect to their proposed Case Management Order and Notice [Docket No. 13007]. In their

Certification, the Debtors' stated that they believed the Case Management Order and Notice attached thereto "accurately reflects the Court's recent rulings with respect to the PD claims process." The PD Committee strongly disagrees with this statement and urges the Court not to enter the Order or approve the Notice before the parties have an opportunity to present this matter to the Court on August 21, 2006.

Wilmington, Delaware Dated: August 18, 2006

Respectfully submitted,

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and

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By: /s/ Lisa L. Coggins
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